

# **Exhibit A**



Benjamin W. Hulse  
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October 12, 2017

**VIA EMAIL AND U.S. MAIL**

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4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Osborne v. 3M Company et al et al* Case No.: 0:17-cv-02099-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Osborne\_Vanessa\_17-cv-2099\_1\_Osborne\_Vanessa\_17-cv-2099\_1"

Osborne\_Vanessa\_17-  
cv-  
2099\_1\_Osborne\_Vane  
ssa\_17-cv-2099\_1

PLAINTIFFS' LAST NAME - Osborne  
PLAINTIFFS' FIRST NAME - Vanessa  
CASE NO. - 17-cv-2099  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com



Benjamin W. Hulse  
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October 18, 2017

**VIA EMAIL AND U.S. MAIL**

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Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Nunn v. 3M Company et al et al* Case No.: 0:17-cv-02231-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Title "Nunn\_Kenneth\_17-cv-2231\_1\_Nunn\_Kenneth\_17-cv-2231\_1"

Nunn\_Kenneth\_17-  
cv-  
2231\_1\_Nunn\_Kennet  
h\_17-cv-2231\_1

PLAINTIFFS' LAST NAME - Nunn  
PLAINTIFFS' FIRST NAME - Kenneth  
CASE NO. - 17-cv-2231  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 02, 03, 06, 08, 09, 10, 11, 12, 13  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



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October 24, 2017

**VIA EMAIL AND U.S. MAIL**

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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Taylor v. 3M Company et al* Case No.: 0:17-cv-02319-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Taylor\_Mary\_17-cv-2319\_1\_Taylor\_Mary\_17-cv-2319\_1"

Taylor\_Mary\_17-cv-  
2319\_1\_Taylor\_Mary\_1  
7-cv-2319\_1

PLAINTIFFS' LAST NAME - Taylor  
PLAINTIFFS' FIRST NAME - Mary  
CASE NO. - 17-cv-2319  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
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October 25, 2017

**VIA EMAIL AND U.S. MAIL**

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4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Blancett v. 3M Company et al* Case No.: 0:17-cv-02383-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Blancett\_Constance\_017-cv-02383\_1\_Blancett\_Constance\_017-cv-02383\_1"

Blancett\_Constance  
\_017-cv-  
02383\_1\_Blancett\_Co  
nstance\_017-cv-  
02383\_1

PLAINTIFFS' LAST NAME - Blancett  
PLAINTIFFS' FIRST NAME - Constance  
CASE NO. - 0:17-cv-02383  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
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October 25, 2017

**VIA EMAIL AND U.S. MAIL**

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Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Pickett v. 3M Company et al* Case No.: 0:17-cv-02415-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Pickett\_Paul\_17-cv-2415\_1\_Pickett\_Paul\_17-cv-2415\_1"

Pickett\_Paul\_17-cv-  
2415\_1\_Pickett\_Paul\_1  
7-cv-2415\_1

PLAINTIFFS' LAST NAME - Pickett  
PLAINTIFFS' FIRST NAME - Paul  
CASE NO. - 17-cv-2415  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
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SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
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Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

October 25, 2017

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Suchan v. 3M Company et al* Case No.: 0:17-cv-02452-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure



Title "Suchan\_John\_17-cv-2452\_1\_Suchan\_John\_17-cv-2452\_1"

Suchan\_John\_17-cv-  
2452\_1\_Suchan\_John  
\_17-cv-2452\_1

PLAINTIFFS' LAST NAME - Suchan

PLAINTIFFS' FIRST NAME - John

CASE NO. - 17-cv-2452

SECTION I (CASE INFORMATION) -

SECTION II (PERSONAL INFORMATION) - Incomplete

SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16

SECTION III (SURGERY INFORMATION) -

SECTION IV - 1 (VITAL STATISTICS) - Incomplete

SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete

SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete

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SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete

SECTION IV - 9 (TOBACCO) - Incomplete

SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete

SECTION IX - 3 (RESIDENCES) - Incomplete

SECTION IX - 4 (MARRIED) - Incomplete

SECTION V - 5 (DISABILITY CLAIMS) - Incomplete

SECTION V - 6 (LAWSUITS) - Incomplete

SECTION V - 7 (BANKRUPTCY) - Incomplete

SECTION VI - 1 (PHYSICAL INJURY) - Incomplete

SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete

SECTION VI - 6 (WARNINGS) - Incomplete

SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete

SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete

SECTION VI - 9 (AUGUSTINE) - Incomplete

SECTION VII - 1 (LOST PAST WAGES) - Incomplete

SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete

SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) - Incomplete

X.01 - SIGNED AUTHORIZATION - Incomplete

X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete

I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse  
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October 31, 2017

**VIA EMAIL AND U.S. MAIL**

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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Rashad v. 3M Company et al* Case No.: 0:17-cv-02589-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Rashad\_Kevin\_17-cv-2589\_1\_Rashad\_Kevin\_17-cv-2589\_1"

Rashad\_Kevin\_17-cv-  
2589\_1\_Rashad\_Kevin  
\_17-cv-2589\_1

PLAINTIFFS' LAST NAME - Rashad  
PLAINTIFFS' FIRST NAME - Audrey  
CASE NO. - 0:17-cv-02589  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com



Benjamin W. Hulse  
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E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

November 6, 2017

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*McCall v. 3M Company et al et al* Case No.: 0:17-cv-02726-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Corbett\_Terry\_017-cv-02726\_1\_Corbett\_Terry\_017-cv-02726\_1

PLAINTIFFS' LAST NAME - Corbett  
PLAINTIFFS' FIRST NAME - Terry  
CASE NO. - 17-cv-2726  
SECTION I (CASE INFORMATION) - Incomplete  
SECTION II (PERSONAL INFORMATION) -  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

November 17, 2017

**VIA EMAIL AND U.S. MAIL**

David W. Hodges  
Kennedy Hodges, L.L.P.  
4409 Montrose Blvd, Ste 200  
Houston, TX, 77006  
[mtg@kennedyhodges.com](mailto:mtg@kennedyhodges.com)

*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*McLaughlin v. 3M Company et al* Case No.: 0:17-cv-03233-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "McLaughlin\_Robert\_17-cv-3233\_1\_McLaughlin\_Robert\_17-cv-3233\_1"

McLaughlin\_Robert\_1  
7-cv-  
3233\_1\_McLaughlin\_R  
obert\_17-cv-3233\_1

PLAINTIFFS' LAST NAME - McLaughlin  
PLAINTIFFS' FIRST NAME - Robert  
CASE NO. - 17-cv-3233  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 07, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.  
I.03.D2 - PLAINTIFFS' COUNSEL'S FAX - 713-523-1116

# **Exhibit B**





October 12, 2017

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Gruetzmacher v. 3M Company* Case No.: 0:17-cv-00998-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Gruetzmacher\_Laura\_017-cv-00998\_1\_Gruetzmacher\_Laura\_017-cv-00998\_1"

Gruetzmacher\_Laura  
\_017-cv-  
00998\_1\_Gruetzmache  
r\_Laura\_017-cv-  
00998\_1

PLAINTIFFS' LAST NAME - Gruetzmacher  
PLAINTIFFS' FIRST NAME - Laura  
CASE NO. - 0:17-cv-00998  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 07, 08, 09  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

October 12, 2017

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Guzman v. 3M Company* Case No.: 0:17-cv-01017-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Guzman\_Maria\_017-cv-01017\_1\_Guzman\_Maria\_017-cv-01017\_1"

Guzman\_Maria\_017-  
cv-  
01017\_1\_Guzman\_Mar  
ia\_017-cv-01017\_1

PLAINTIFFS' LAST NAME - Guzman  
PLAINTIFFS' FIRST NAME - Maria  
CASE NO. - 0:17-cv-01017  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 09, 10  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

November 01, 2017

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Husman v. 3M Company* Case No.: 0:17-cv-01139-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Husman\_Raymond\_017-cv-01139\_1\_Husman\_Raymond\_017-cv-01139\_1"

Husman\_Raymond\_01  
7-cv-  
01139\_1\_Husman\_Ray  
mond\_017-cv-01139\_1

PLAINTIFFS' LAST NAME - Husman  
PLAINTIFFS' FIRST NAME - Raymond  
CASE NO. - 0:17-cv-01139  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 07, 08, 09, 10, 11, 12, 13  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/Written STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - dnigh@levinlaw.com



November 13, 2017

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Pickens v. 3M Company* Case No.: 0:17-cv-01215-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Pickens\_Michael\_017-cv-01215\_1\_Pickens\_Michael\_017-cv-01215\_1"

Pickens\_Michael\_017-  
cv-  
01215\_1\_Pickens\_Mich  
ael\_017-cv-01215\_1

PLAINTIFFS' LAST NAME - Pickens  
PLAINTIFFS' FIRST NAME - Michael  
CASE NO. - 0:17-cv-01215  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 02, 03, 06, 08, 09, 10, 11, 12, 13  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 03  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) -  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -  
SECTION IV - 8 (DENTAL PROCEDURES) -  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio  
I.03.D2 - PLAINTIFFS' COUNSEL'S FAX - (850)435-7020





November 13, 2017

Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh

Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.

316 South Baylen St. Suite 400

Pensacola, Florida 32502

[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Sparks v. 3M Company* Case No.: 0:17-cv-01250-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Sparks\_Mildred\_017-cv-01250\_1\_Sparks\_Mildred\_017-cv-01250\_1"

Sparks\_Mildred\_017-  
cv-  
01250\_1\_Sparks\_Mildr  
ed\_017-cv-01250\_1

PLAINTIFFS' LAST NAME - Sparks  
PLAINTIFFS' FIRST NAME - Mildred  
CASE NO. - 0:17-cv-01250  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) -  
SECTION III (SURGERY INFORMATION) -  
SECTION IV - 1 (VITAL STATISTICS) -  
SECTION IV - 10 (DRUG/ALCOHOL) -  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) -  
SECTION IX - 1 (CONSORTIUM NAME ETC.) -  
SECTION IX - 3 (RESIDENCES) -  
SECTION IX - 4 (MARRIED) -  
SECTION V - 5 (DISABILITY CLAIMS) -  
SECTION V - 6 (LAWSUITS) -  
SECTION V - 7 (BANKRUPTCY) -  
SECTION VI - 1 (PHYSICAL INJURY) -  
SECTION VI - 3 (EMOTIONAL DISTRESS) -  
SECTION VI - 6 (WARNINGS) -  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -  
SECTION VI - 8 (3M/ARIZANT WARRANTY) -  
SECTION VI - 9 (AUGUSTINE) -  
SECTION VII - 1 (LOST PAST WAGES) -  
SECTION VII - 2 (LOST FUTURE WAGES) -  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.D2 - PLAINTIFFS' COUNSEL'S FAX - (850)435-7020



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

November 13, 2017

**VIA EMAIL AND U.S. MAIL**

Daniel A. Nigh  
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.  
316 South Baylen St. Suite 400  
Pensacola, Florida 32502  
[dnigh@levinlaw.com](mailto:dnigh@levinlaw.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Peters v. 3M Company* Case No.: 0:17-cv-01323-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Peters\_Christopher\_017-cv-01323\_1\_Peters\_Christopher\_017-cv-01323\_1"

Peters\_Christopher\_0  
17-cv-  
01323\_1\_Peters\_Christ  
opher\_017-cv-01323\_1

PLAINTIFFS' LAST NAME - Peters  
PLAINTIFFS' FIRST NAME - Christopher  
CASE NO. - 0:17-cv-01323  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 01, 02, 03, 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.  
I.03.D2 - PLAINTIFFS' COUNSEL'S FAX - (850)435-7020



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

November 8, 2017

**VIA EMAIL AND U.S. MAIL**

Seth Webb  
Brown and Crouppen, P.C.  
211 N. Broadway, Suite 1600  
St. Louis, MO 63102  
[sethw@getbc.com](mailto:sethw@getbc.com)

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet  
*Jadwin et al v. 3M Company et al* Case No.: 0:17-cv-01407-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel  
Enclosure

Title "Jadwin\_Patti\_017-cv-1407\_1\_Jadwin\_Patti\_017-cv-1407\_1"

Jadwin\_Patti\_017-cv-  
1407\_1\_Jadwin\_Patti\_0  
17-cv-1407\_1

PLAINTIFFS' LAST NAME - Jadwin  
PLAINTIFFS' FIRST NAME - Patti  
CASE NO. - 0:17-cv-1407  
SECTION I (CASE INFORMATION) -  
SECTION II (PERSONAL INFORMATION) - Incomplete  
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16  
SECTION III (SURGERY INFORMATION) - Incomplete  
SECTION III - INCOMPLETE QUESTIONS - 01, 03, 04, 05  
SECTION IV - 1 (VITAL STATISTICS) - Incomplete  
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete  
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete  
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete  
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete  
SECTION IV - 9 (TOBACCO) - Incomplete  
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete  
SECTION IX - 3 (RESIDENCES) - Incomplete  
SECTION IX - 4 (MARRIED) - Incomplete  
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete  
SECTION V - 6 (LAWSUITS) - Incomplete  
SECTION V - 7 (BANKRUPTCY) - Incomplete  
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete  
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete  
SECTION VI - 6 (WARNINGS) - Incomplete  
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete  
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete  
SECTION VI - 9 (AUGUSTINE) - Incomplete  
SECTION VII - 1 (LOST PAST WAGES) - Incomplete  
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete  
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete  
X.01 - SIGNED AUTHORIZATION - Incomplete  
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete  
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Brown & Crouppen  
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - sethw@getbc.com

# Exhibit C



**From:** Ben Hulse

**Sent:** Monday, December 18, 2017 2:20 PM

**To:** 'JoanEricksen\_Chambers@mnd.uscourts.gov' <[JoanEricksen\\_Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov)>; 'Noel\_Chambers@mnd.uscourts.gov' <[Noel\\_Chambers@mnd.uscourts.gov](mailto:Noel_Chambers@mnd.uscourts.gov)>; 'Leary, William (Judge)' <[William.Leary@courts.state.mn.us](mailto:William.Leary@courts.state.mn.us)>

**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; 'Ahmann, Bridget M.' <[Bridget.Ahmann@FaegreBD.com](mailto:Bridget.Ahmann@FaegreBD.com)>; 'gzimmerman@meshbesh.com' <[gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com)>; 'bgordon@levinlaw.com' <[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>; 'MVC@ciresiconlin.com' <[MVC@ciresiconlin.com](mailto:MVC@ciresiconlin.com)>; 'JMC@CiresiConlin.com' <[JMC@CiresiConlin.com](mailto:JMC@CiresiConlin.com)>; Mary Young <[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)>

**Subject:** Joint Agenda and Status Report for December 21 Status Conference (MDL No. 15-2666 (JNE/FLN))

Dear Judge Ericksen and Judge Noel,

In accordance with Pretrial Order No. 3, the parties submit this Joint Agenda and Status Conference Report in preparation for the status conference scheduled for Thursday, December 21, at 9:30 a.m. We apologize for the delay in make this submission.

Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Agenda, are also attached to this email. Defendants' proposed pretrial order concerning the process for substitutions for deceased plaintiffs, referenced in Section 6, is also attached. As noted in the Joint Agenda, Plaintiffs will oppose entry of that proposed order.

We have copied Judge Leary here as well.

Best regards,  
Ben Hulse

Benjamin W. Hulse  
Blackwell Burke P.A.  
431 South Seventh Street, Suite 2500  
Minneapolis, MN 55415  
Direct (612) 343-3256  
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.



**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-01441-JNE-FLN</a>	Morgan v. 3M Company et al	5/1/2017	7/30/2017		8/10/2017 9/07/2017 10/13/2017 11/07/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02747-JNE-FLN</a>	Graves v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-02738-JNE-FLN</a>	Allen v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-02755-JNE-FLN</a>	Morris v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-02763-JNE-FLN</a>	Maxheimer v. 3M Company et al	7/11/2017	10/9/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-02881-JNE-FLN</a>	Prince v. 3M Company et al	7/13/2017	10/11/2017		11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02853-JNE-FLN</a>	Wallis v. 3M Company et al	7/13/2017	10/11/2017		11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02892-JNE-FLN</a>	Saylor v. 3M Company et al	7/14/2017	10/12/2017		11/7/2017	The Olinde Firm, LLC
<a href="#">0:17-cv-03038-JNE-FLN</a>	Schapansky v. 3M Company et al	7/18/2017	10/16/2017		11/7/2017	Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03103-JNE-FLN</a>	Ghidella v. 3M Company et al	7/19/2017	10/17/2017			Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03187-JNE-FLN</a>	Gawthorp v. 3M Company et al	7/21/2017	10/19/2017			Kennedy Hodges, L.L.P
<a href="#">0:17-cv-03252-JNE-FLN</a>	Gorbett v. 3M Company et al	7/23/2017	10/21/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03380-JNE-FLN</a>	Rowan v. 3M Company et al	7/27/2017	10/24/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03414-JNE-FLN</a>	Towsley v. 3M Company et al	7/27/2017	10/25/2017			Sexton & Shelor
<a href="#">0:17-cv-03413-JNE-FLN</a>	Williams, Wanda v. 3M Company, et al	7/28/2017	10/26/2017			Sexton & Shelor
<a href="#">0:17-cv-03441-JNE-FLN</a>	Landers v. 3M Company et al	7/28/2017	10/26/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03440-JNE-FLN</a>	Williams v. 3M Company et al	7/31/2017	10/29/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03573-JNE-FLN</a>	Parker v. 3M Company et al	8/4/2017	11/2/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03658-JNE-FLN</a>	Beach v. 3M Company et al	8/9/2017	11/7/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03679-JNE-FLN</a>	Elliott, Steve v. 3M Company et al	8/11/2017	11/9/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03811-JNE-FLN</a>	Pope v. 3M Company et al	8/17/2017	11/15/2017			Kirtland and Packard LLP



**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-03819-JNE-FLN</a>	Mazer v. 3M Company et al	8/18/2017	11/15/2017			Hollis Legal Solutions, PLLC
<a href="#">0:17-cv-03823-JNE-FLN</a>	Miller, Carol v. 3M Company et al	8/18/2017	11/15/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03868-JNE-FLN</a>	Montgomery, Harold et al v. 3M Company et al	8/22/2017	11/19/2017			Schlichter Bogard & Denton, LLP
<a href="#">0:17-cv-03895-JNE-FLN</a>	Loving v. 3M Company et al	8/23/2017	11/20/2017			Kennedy Hodges
<a href="#">0:17-cv-03937-JNE-FLN</a>	Siegel v. 3M Company et al	8/24/2017	11/21/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03948-JNE-FLN</a>	Gilliam et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03950-JNE-FLN</a>	Jacks et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03952-JNE-FLN</a>	Pratt et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03956-JNE-FLN</a>	Reeves v. 3M Company et al	8/25/2017	11/23/2017			Kennedy Hodges
<a href="#">0:17-cv-03954-JNE-FLN</a>	Rietz et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03962-JNE-FLN</a>	Sale et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03964-JNE-FLN</a>	Taylor, Whitney and Pat et al v. 3M Company et al	8/25/2017	11/23/2017			Brent Coon & Associates
<a href="#">0:17-cv-03994-JNE-FLN</a>	Cook, Delores v. 3M Company et al	8/25/2017	11/23/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-03997-JNE-FLN</a>	Keith, Wesley v. 3M Company et al	8/28/2017	11/25/2017			The Miller Firm, LLC
<a href="#">0:17-cv-04005-JNE-FLN</a>	Salazar v. 3M Company et al	8/28/2017	11/25/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04028-JNE-FLN</a>	Allagas v. Arizant Healthcare, Inc. et al	8/29/2017	11/26/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04009-JNE-FLN</a>	Rude v. 3M Company et al	8/30/2017	11/27/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04043-JNE-FLN</a>	Ground v. 3M Company et al	8/30/2017	11/27/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04094-JNE-FLN</a>	O'Connell v. 3M Company et al	8/31/2017	11/28/2017			Bachus & Schanker, LLC

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated December 15, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<a href="#">0:17-cv-04084-JNE-FLN</a>	Pemberton, Debora v. 3M Company et al	8/31/2017	11/28/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04065-JNE-FLN</a>	Smigla v. 3M Company et al	8/31/2017	11/28/2017			Bernstein Liebhard LLP
<a href="#">0:17-cv-04143-JNE-FLN</a>	Gregovich v. 3M Company et al	9/5/2017	12/4/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04145-JNE-FLN</a>	Harper v. 3M Company et al	9/5/2017	12/4/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04148-JNE-FLN</a>	Thomas, Collin et al v. 3M Company et al	9/6/2017	12/5/2017			Bachus & Schanker, LLC
<a href="#">0:17-cv-04158-JNE-FLN</a>	Young, Debra v. 3M Company et al	9/7/2017	12/6/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04177-JNE-FLN</a>	Butler, James v. 3M Company et al	9/7/2017	12/6/2017			Kennedy Hodges
<a href="#">0:17-cv-04182-JNE-FLN</a>	Roberts, Carol v. 3M Company et al	9/7/2017	12/6/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-04230-JNE-FLN</a>	Metivier v. 3M Company et al	9/12/2017	12/11/2017			Kirtland and Packard LLP
<a href="#">0:17-cv-03941-JNE-FLN</a>	Martinez v. 3M Company et al	8/24/2017	11/29/2017			DeGaris & Rogers, LLC
<a href="#">0:17-cv-03925-JNE-FLN</a>	Smith, June v. 3M Company et al	8/24/2017	11/29/2017			DeGaris & Rogers, LLC



**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated December 15, 2017)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<a href="#">0:17-cv-01879-JNE-FLN</a>	Sellers v. 3M Company et al	9/28/2017	10/19/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-01027-JNE-FLN</a>	Warren v. 3M Company et al	10/12/2017	11/2/2017	11/7/2017	Bernstein Liebhard LLP
<a href="#">0:17-cv-02099-JNE-FLN</a>	Osborne v. 3M Company et al	10/12/2017	11/2/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02231-JNE-FLN</a>	Nunn v. 3M Company et al	10/18/2017	11/8/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02319-JNE-FLN</a>	Taylor, Mary v. 3M Company et al	10/24/2017	11/15/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02383-JNE-FLN</a>	Blancett v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02415-JNE-FLN</a>	Pickett v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02452-JNE-FLN</a>	Suchan v. 3M Company et al	10/25/2017	11/16/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02589-JNE-FLN</a>	Rashad v. 3M Company et al	10/31/2017	11/21/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02642-JNE-FLN</a>	Richey v. 3M Company et al	11/2/2017	11/23/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02726-JNE-FLN</a>	McCall v. 3M Company et al	11/7/2017	11/28/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-02745-JNE-FLN</a>	Devries v. 3M Company et al	11/6/2017	11/27/2017		The Olinde Firm, LLC
<a href="#">0:17-cv-03795-JNE-FLN</a>	Winston v. 3M Company et al	11/8/2017	11/29/2017		Bachus & Schanker, LLC
<a href="#">0:17-cv-03101-JNE-FLN</a>	Perry v. 3M Company et al	11/14/2017	12/5/2017		Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-03233-JNE-FLN</a>	McLaughlin v. 3M Company et al	11/17/2017	12/8/2017		Kennedy Hodges, L.L.P.
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date		Firm Name
<a href="#">0:17-cv-00286-JNE-FLN</a>	Charles v. 3M Company et al.	8/14/2017	9/4/2017	9/7/2017 10/13/2017 11/07/2017	The Law offices of Travis R. Walker, P.A
<a href="#">0:17-cv-01082-JNE-FLN</a>	Petrakis v. 3M Company et al	9/18/2017	10/9/2017	11/7/2017	Kennedy Hodges, L.L.P.
<a href="#">0:17-cv-01122-JNE-FLN</a>	Griggs v. 3M Company et al	10/25/2017	11/15/2017		The Olinde Firm, LLC
<a href="#">0:17-cv-01731-JNE-FLN</a>	Ethelbah v. 3M Company et al	11/14/2017	12/5/2017		Lockridge, Grindal Nauen P.L.L.P.
<a href="#">0:16-cv-04381-JNE-FLN</a>	Manzanares v. 3M Company et al	11/20/2017	12/11/2017		Bernstein Liebhard LLP

**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated December 15, 2017)

<u>Case Number</u>	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-00288-JNE-FLN</u>	Bradford v. 3M Company et al	9/29/2017	10/20/2017	11/7/2017	The Law offices of Travis R. Walker, P.A.
<u>0:15-cv-03736-JNE-FLN</u>	Printup v. 3M Company et al	6/28/2017	7/19/2017		Gustafson Gluek PLLC



## Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated December 15, 2017)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
<a href="#">0:16-cv-03618-JNE-FLN</a>	Messner-Katzer v. 3M Company et al	5/16/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	Capretz & Associates
<a href="#">0:17-cv-00343-JNE-FLN</a>	Grooms v. 3M Company	8/24/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00570-JNE-FLN</a>	Harrison v. 3M Company	9/1/2017	10/13/2017 11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00640-JNE-FLN</a>	Johnson v. 3M Company et al	10/3/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00711-JNE-FLN</a>	Garcia v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-00998-JNE-FLN</a>	Gruetzmacher v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01017-JNE-FLN</a>	Guzman v. 3M Company	10/16/2017	11/7/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-02212-JNE-FLN	Smith, Leonard	10/12/2017	11/7/2017	Brown & Crouppen, PC
<a href="#">0:16-cv-03991-JNE-FLN</a>	Overko v. 3M Company	6/30/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01139-JNE-FLN</a>	Husman v. 3M Company	11/1/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
<a href="#">0:17-cv-01407-JNE-FLN</a>	Jadwin et al v. 3M Company et al	11/8/2017		Brown and Crouppen, P.C.
<a href="#">0:17-cv-01323-JNE-FLN</a>	Peters v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
<a href="#">0:17-cv-01215-JNE-FLN</a>	Pickens v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
<a href="#">0:17-cv-01250-JNE-FLN</a>	Sparks v. 3M Company	11/13/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

# Exhibit D

**From:** Ben Hulse

**Sent:** Friday, January 12, 2018 9:36 PM

**To:** Genevieve Zimmerman <[gzimmerman@meshbesh.com](mailto:gzimmerman@meshbesh.com)>;

[JoanEricksen.Chambers@mnd.uscourts.gov](mailto:JoanEricksen.Chambers@mnd.uscourts.gov); [noel\\_chambers@mnd.uscourts.gov](mailto:noel_chambers@mnd.uscourts.gov)

**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; Mary Young

<[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)>; Jan Conlin <[JMC@ciresiconlin.com](mailto:JMC@ciresiconlin.com)>; Ben Gordon

<[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>; David Szerlag <[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>

**Subject:** RE: MDL 2666 - Bair Hugger - Joint Status Report and Suggested Agenda for Status Conference

Dear Judge Ericksen and Judge Noel,

Defendants' three lists related to the Plaintiff Fact Sheets, as discussed in Section 2 of the Joint Status Report, are attached to this email.

Best regards,

Ben Hulse

Benjamin W. Hulse

Blackwell Burke P.A.

431 South Seventh Street, Suite 2500

Minneapolis, MN 55415

Direct (612) 343-3256

Fax (612) 343-3205

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**From:** Genevieve Zimmerman [<mailto:gzimmerman@meshbesh.com>]

**Sent:** Friday, January 12, 2018 6:08 PM

**To:** [JoanEricksen.Chambers@mnd.uscourts.gov](mailto:JoanEricksen.Chambers@mnd.uscourts.gov); [noel\\_chambers@mnd.uscourts.gov](mailto:noel_chambers@mnd.uscourts.gov)

**Cc:** Jerry Blackwell <[blackwell@blackwellburke.com](mailto:blackwell@blackwellburke.com)>; Mary Young

<[myoung@blackwellburke.com](mailto:myoung@blackwellburke.com)>; Ben Hulse <[BHulse@blackwellburke.com](mailto:BHulse@blackwellburke.com)>; Jan Conlin

<[JMC@ciresiconlin.com](mailto:JMC@ciresiconlin.com)>; Ben Gordon <[bgordon@levinlaw.com](mailto:bgordon@levinlaw.com)>; David Szerlag

<[david@pritzkerlaw.com](mailto:david@pritzkerlaw.com)>

**Subject:** MDL 2666 - Bair Hugger - Joint Status Report and Suggested Agenda for Status Conference

Dear Judge Ericksen and Judge Noel,

Attached please find the parties' Joint Status Report and Suggested Agenda for the MDL status conference next week. This is being submitted jointly.

Additionally please find Plaintiffs' Proposed Order concerning repopulating the bellwether pool. The Defendants submitted their requested order earlier this week.

Please feel free to contact us with questions.



Respectfully submitted,

Genevieve Zimmerman

Genevieve M. Zimmerman  
Meshbeshier & Spence Ltd.  
1616 Park Avenue  
Minneapolis, MN 55404  
(612) 339-9121 (office)  
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(651) 208-8357 (cell)

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated January 12, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:17-cv-02738-JNE-FLN	Allen, Janet v. 3M Company et al	7/11/2017	10/9/2017	11/7/2017 12/15/2017	The Olinde Firm, LLC
0:17-cv-02747-JNE-FLN	Graves, Elizabeth v. 3M Company et al	7/11/2017	10/9/2017	11/7/2017 12/15/2017	The Olinde Firm, LLC
0:17-cv-02755-JNE-FLN	Morris, Kathlynn v. 3M Company et al	7/11/2017	10/9/2017	11/7/2017 12/15/2017	Kennedy Hodges, LLP
0:17-cv-02763-JNE-FLN	Maxheimer v. 3M Company et al	7/11/2017	10/9/2017	11/7/2017 12/15/2017	Kennedy Hodges, LLP
0:17-cv-02881-JNE-FLN	Prince, Nadine v. 3M Company et al	7/13/2017	10/11/2017	11/7/2017 12/15/2017	Bernstein Liebhard LLP
0:17-cv-02892-JNE-FLN	Saylor, Lee v. 3M Company et al	7/14/2017	10/12/2017	11/7/2017 12/15/2017	The Olinde Firm, LLC
0:17-cv-03038-JNE-FLN	Schapansky, Ray v. 3M Company et al	7/18/2017	10/16/2017	11/7/2017 12/15/2017	Kennedy Hodges, LLP
0:17-cv-03103-JNE-FLN	Ghidella v. 3M Company et al	7/19/2017	10/17/2017	12/15/2017	Kennedy Hodges, LLP
0:17-cv-03187-JNE-FLN	Gawthorp v. 3M Company et al	7/21/2017	10/19/2017	12/15/2017	Kennedy Hodges, LLP
0:17-cv-03819-JNE-FLN	Mazer, Marc v. 3M Company et al	8/18/2017	11/15/2017	12/15/2017	Hollis Legal Solutions, PLLC
0:17-cv-03823-JNE-FLN	Miller, Carol v. 3M Company et al	8/18/2017	11/15/2017	12/15/2017	Bernstein Liebhard LLP
0:17-cv-03895-JNE-FLN	Loving, Dorothy v. 3M Company et al	8/23/2017	11/20/2017	12/15/2017	Kennedy Hodges, LLP
0:17-cv-03948-JNE-FLN	Gilliam, Lisette et al v. 3M Company et al	8/25/2017	11/23/2017	12/15/2017	Brent Coon & Associates
0:17-cv-03954-JNE-FLN	Rietz, Mary et al v. 3M Company et al	8/25/2017	11/23/2017	12/15/2017	Brent Coon & Associates
0:17-cv-03956-JNE-FLN	Reeves, William v. 3M Company et al	8/25/2017	11/23/2017	12/15/2017	Kennedy Hodges, LLP
0:17-cv-04005-JNE-FLN	Salazar, Antonio v. 3M Company et al	8/28/2017	11/25/2017	12/15/2017	Kirtland and Packard LLP



**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated January 12, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:17-cv-04028-JNE-FLN	Allagas, Victoria v. Arizant Healthcare, Inc. et al	8/29/2017	11/26/2017	12/15/2017	Kirtland and Packard LLP
0:17-cv-04094-JNE-FLN	O'Connell, Karen v. 3M Company et al	8/31/2017	11/28/2017	12/15/2017	Bachus & Schanker, LLC
0:17-cv-04148-JNE-FLN	Thomas, Collin et al v. 3M Company et al	9/6/2017	12/5/2017	12/15/2017	Bachus & Schanker, LLC
0:17-cv-04158-JNE-FLN	Young, Debra v. 3M Company et al	9/7/2017	12/6/2017	12/15/2017	Kirtland and Packard LLP
0:17-cv-04177-JNE-FLN	Butler, James v. 3M Company et al	9/7/2017	12/6/2017	12/15/2017	Kennedy Hodges
0:17-cv-04182-JNE-FLN	Roberts, Carol v. 3M Company et al	9/7/2017	12/6/2017	12/15/2017	Kirtland and Packard LLP
0:17-cv-04230-JNE-FLN	Metivier, Gwendylen v. 3M Company et al	9/12/2017	12/11/2017	12/15/2017	Kirtland and Packard LLP
0:17-cv-04229-JNE-FLN	Wager, Geraldine v. 3M Company et al	9/13/2017	12/12/2017		Kirtland & Packard LLP
0:17-cv-04272-JNE-FLN	Moody, Virginia v. 3M Company et al	9/14/2017	12/13/2017		Kirtland & Packard LLP
0:17-cv-04283-JNE-FLN	Stancil, Rickie et al v. 3M Company et al	9/15/2017	12/14/2017		Schlichter, Bogard & Denton, LLP
0:17-cv-04293-JNE-FLN	Mason, Kenneth v. 3M Company et al	9/18/2017	12/17/2017		Davis & Crump, P.C.
0:17-cv-04294-JNE-FLN	Washington, Vinetta v. 3M Company et al	9/18/2017	12/17/2017		Bachus & Schanker, LLC
0:17-cv-04298-JNE-FLN	Colby, Charles Gilbert v. 3M Company et al	9/18/2017	12/17/2017		Pro se
0:17-cv-04313-JNE-FLN	McNease, Janet v. 3M Company et al	9/19/2017	12/18/2017		Kirtland and Packard LLP
0:17-cv-04314-JNE-FLN	Sherrrod, Leroy v. 3M Company et al	9/19/2017	12/18/2017		Kirtland and Packard LLP
0:17-cv-04366-JNE-FLN	Thames, Gregory v. 3M Company et al	9/22/2017	12/21/2017		Schlichter Bogard & Denton, LLP

**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**  
(Updated January 12, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:17-cv-04375-JNE-FLN	Baker, David v. 3M Company et al	9/25/2017	12/24/2017		Bernstein Liebhard LLP
0:17-cv-04406-JNE-FLN	Davis, Ida v. 3M Company et al	9/27/2017	12/26/2017		Kirtland and Packard LLP
0:17-cv-04429-JNE-FLN	Holcomb, April v. 3M Company et al	9/27/2017	12/26/2017		DeGaris & Rogers, LLC
0:17-cv-04431-JNE-FLN	Slaughter, Shirley v. 3M Company et al	9/27/2017	12/26/2017		Kirtland and Packard LLP
0:17-cv-04467-JNE-FLN	Adams, Artis v. 3M Company et al	9/28/2017	12/27/2017		Gustafson Gluek PLLC
0:17-cv-04470-JNE-FLN	Ingram, Virginia v. 3M Company et al	9/28/2017	12/27/2017		Bernstein Liebhard LLP
0:17-cv-04476-JNE-FLN	Holstine, Rachel v. 3M Company et al	9/28/2017	12/27/2017		Bernstein Liebhard LLP
0:17-cv-04485-JNE-FLN	Pollard, Douglas et al v. 3M Company et al	9/28/2017	12/27/2017		Pendley, Baudin & Coffin L.L.P.
0:17-cv-04494-JNE-FLN	Dresser, Christopher v. 3M Company et al	9/28/2017	12/27/2017		Skikos Crawford Skikos & Joseph
0:17-cv-04500-JNE-FLN	Hammel-Fogleboch v. 3M Company et al	9/28/2017	12/27/2017		Kennedy Hodges
0:17-cv-04512-JNE-FLN	Cunningham, Mary v. 3M Company et al	10/3/2017	1/1/2018		Bernstein Liebhard LLP
0:17-cv-04518-JNE-FLN	Robertson, Douglas v. 3M Company et al	10/3/2017	1/1/2018		Meshbesher & Spence, LTD
0:17-cv-04515-JNE-FLN	Horn, Warren v. 3M Company et al	10/3/2017	1/1/2018		Bernstein Liebhard LLP
0:17-cv-04517-JNE-FLN	Henderson, Stephanie v. 3M Company et al	10/3/2017	1/1/2018		Bernstein Liebhard LLP
0:17-cv-04519-JNE-FLN	Williams, Janice v. 3M Company et al	10/3/2017	1/1/2018		Bernstein Liebhard LLP
0:17-cv-04528-JNE-FLN	Sims, Ashlee v. 3M Company et al	10/4/2017	1/2/2018		Johnson Becker PLLC



**Defendants' PFS List 1: Overdue Plaintiff Fact Sheets**

(Updated January 12, 2018)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:17-cv-04549-JNE-FLN	Salcido, Diego v. 3M Company et al	10/5/2017	1/3/2018		Davis & Crump, P.C.
0:17-cv-04556-JNE-FLN	Blair, Bridget v. 3M Company et al	10/5/2017	1/3/2018		Kirtland and Packard LLP
0:17-cv-04628-JNE-FLN	Grace, Emily v. 3M Company et al	10/10/2017	1/8/2018		Kirtland and Packard LLP

Yellow highlighting indicates that the case was previously listed on one or two status conference agendas per PTO 14 (D.E. 270).  
Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated January 12, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-01879-JNE-FLN	Sellers v. 3M Company et al	9/28/2017	10/19/2017	11/07/2017 12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02099-JNE-FLN	Osborne v. 3M Company et al	10/12/2017	11/2/2017	11/07/2017 12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02231-JNE-FLN	Nunn v. 3M Company et al	10/18/2017	11/8/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02319-JNE-FLN	Taylor, Mary v. 3M Company et al	10/24/2017	11/15/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02383-JNE-FLN	Blancett v. 3M Company et al	10/25/2017	11/16/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02415-JNE-FLN	Pickett v. 3M Company et al	10/25/2017	11/16/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02452-JNE-FLN	Suchan v. 3M Company et al	10/25/2017	11/16/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02589-JNE-FLN	Rashad v. 3M Company et al	10/25/2017	11/16/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02726-JNE-FLN	McCall v. 3M Company et al	11/7/2017	11/28/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-02745-JNE-FLN	Devries v. 3M Company et al	11/6/2017	11/27/2017	12/18/2017	The Olinde Firm, LLC
0:17-cv-03233-JNE-FLN	McLaughlin v. 3M Company et al	11/17/2017	12/8/2017	12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-03311-JNE-FLN	McDaniel v. 3M Company et al	11/21/2017	12/12/2017		Kennedy Hodges, L.L.P.
0:17-cv-03445-JNE-FLN	Quinan v. 3M Company et al	11/21/2017	12/12/2017		Kennedy Hodges, L.L.P.
0:17-cv-03502-JNE-FLN	Pledger v. 3M Company et al	11/28/2017	12/19/2017		Kennedy Hodges, L.L.P.
0:17-cv-03547-JNE-FLN	Sundquist v. 3M Company et al	11/29/2017	12/20/2017		Kennedy Hodges, L.L.P.
0:17-cv-03666-JNE-FLN	Gallo v. 3M Company et al	12/5/2017	12/26/2017		Kennedy Hodges, L.L.P.
0:17-cv-03721-JNE-FLN	Ramirez v. 3M Company et al	12/5/2017	12/26/2017		Kennedy Hodges, L.L.P.
0:17-cv-03809-JNE-FLN	Miller v. 3M Company et al	12/12/2017	1/2/2018		Kennedy Hodges, L.L.P.
0:17-cv-03834-JNE-FLN	Thornton v. 3M Company et al	12/13/2017	1/3/2018		Kennedy Hodges, L.L.P.
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-01082-JNE-FLN	Petrakis v. 3M Company et al	9/18/2017	10/9/2017	11/07/2017 12/18/2017	Kennedy Hodges, L.L.P.
0:17-cv-01122-JNE-FLN	Griggs v. 3M Company et al	10/25/2017	11/15/2017	12/18/2017	The Olinde Firm, LLC
0:16-cv-04381-JNE-FLN	Manzanares v. 3M Company et al	11/20/2017	12/11/2017	12/18/2017	Bernstein Liebhard LLP



**Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices**  
(Updated January 12, 2018)

0:17-cv-01978-JNE-FLN	Strain v. 3M Company et al	11/27/2017	12/18/2017		Kennedy Hodges, L.L.P.
0:17-cv-02230-JNE-FLN	Johnson v. 3M Company et al	12/4/2017	12/25/2017		Capretz & Associates
0:17-cv-02251-JNE-FLN	Brewer v. 3M Company et al	12/5/2017	12/26/2017		Capretz & Associates
0:17-cv-02372-JNE-FLN	Hufford v. 3M Company et al	12/6/2017	12/27/2017		Gustafson Gluek PLLC
0:17-cv-02581-JNE-FLN	Key v. 3M Company et al	12/18/2017	1/8/2018		Kennedy Hodges, L.L.P.
<b>Case Number</b>	<b>Title</b>	<b>3rd Deficiency Notice Sent</b>	<b>Response Due Date</b>	<b>Prior Listing</b>	<b>Firm Name</b>
0:15-cv-03736-JNE-FLN	Printup v. 3M Company et al	6/28/2017	7/19/2017	11/07/2017 12/18/2017	Gustafson Gluek PLLC
0:17-cv-00288-JNE-FLN	Bradford v. 3M Company et al	9/29/2017	10/20/2017	11/07/2017 12/18/2017	The Law offices of Travis R. Walker, P.A.
0:17-cv-03215-JNE-FLN	Johnson v. 3M Company et al	12/11/2017	1/1/2018		Brown and Crouppen, P.C

Yellow highlighting indicates that the case was previously listed on one or two status conference agendas per PTO 14 (D.E. 270).

**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated January 12, 2018)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
0:16-cv-03991-JNE-FLN	Overko v. 3M Company	6/30/2017	12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A.
0:17-cv-00343-JNE-FLN	Grooms v. 3M Company	8/24/2017	11/7/2017 12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-00640-JNE-FLN	Johnson v. 3M Company et al	10/3/2017	11/7/2017 12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-00711-JNE-FLN	Garcia v. 3M Company	10/16/2017	11/7/2017 12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-00998-JNE-FLN	Gruetzmacher v. 3M Company	10/16/2017	11/7/2017 12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-01017-JNE-FLN	Guzman/Garcia v. 3M Company	10/16/2017	11/7/2017 12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
0:17-cv-01139-JNE-FLN	Husman v. 3M Company	11/1/2017	12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.
0:17-cv-01215-JNE-FLN	Pickens v. 3M Company	11/13/2017	12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-01250-JNE-FLN	Sparks v. 3M Company	11/13/2017	12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01323-JNE-FLN	Peters v. 3M Company	11/13/2017	12/15/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01407-JNE-FLN	Jadwin et al v. 3M Company et al	11/8/2017	12/15/2017	Brown & Crouppen, P.C.
0:17-cv-01476-JNE-FLN	Behney v. 3M Company et al	12/6/2017		Kennedy Hodges, L.L.P.
0:17-cv-01534-JNE-FLN	Dedmon v. 3M Company	12/11/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01554-JNE-FLN	Dorsey v. 3M Company	11/29/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-01565-JNE-FLN	Little v. 3M Company	11/29/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.
0:17-cv-01574-JNE-FLN	Barnett v. 3M Company	12/11/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:17-cv-02350-JNE-FLN	Gibson v. 3M Company et al	11/21/2017		Brown & Crouppen, P.C.
0:17-cv-02480-JNE-FLN	Brown v. 3M Company et al	12/5/2017		Brown & Crouppen, P.C.
0:17-cv-02487-JNE-FLN	Cooley v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02596-JNE-FLN	Dailey v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02597-JNE-FLN	Davis v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02603-JNE-FLN	Frantz v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02604-JNE-FLN	Friedberg v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02606-JNE-FLN	Gartrell v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02611-JNE-FLN	Hemphill v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02615-JNE-FLN	Houseman v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02663-JNE-FLN	Martin v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02673-JNE-FLN	McMillian v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C
0:17-cv-02677-JNE-FLN	Ossei v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C
0:17-cv-02719-JNE-FLN	Smith v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.



**Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response**  
(Updated January 12, 2018)

0:17-cv-02721-JNE-FLN	Smith v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-02727-JNE-FLN	Temple v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02728-JNE-FLN	Tillman v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-02729-JNE-FLN	Tracey v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02732-JNE-FLN	Walter v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-02733-JNE-FLN	Wilkins v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-02909-JNE-FLN	Bonnett v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-02917-JNE-FLN	Branch v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02919-JNE-FLN	Campbell v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02924-JNE-FLN	Coleman v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02949-JNE-FLN	Jelks v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02959-JNE-FLN	Josephs v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02960-JNE-FLN	Kaveh v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02963-JNE-FLN	Leigh v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02965-JNE-FLN	McElveen v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02967-JNE-FLN	McGruder v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-02970-JNE-FLN	Moore v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-03003-JNE-FLN	Sanchez v. 3M Company et al	11/27/2017		Brown & Crouppen, P.C.
0:17-cv-03010-JNE-FLN	Turner v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-03012-JNE-FLN	Wick v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-03118-JNE-FLN	Horgan v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-03213-JNE-FLN	Jenkins v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-03216-JNE-FLN	Lafferty v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-03219-JNE-FLN	Lewis v. 3M Company et al	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-03229-JNE-FLN	Price v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-03235-JNE-FLN	Rice v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.
0:17-cv-03245-JNE-FLN	Wells, John	12/11/2017		Brown & Crouppen, P.C.
0:17-cv-03251-JNE-FLN	Young v. 3M Company et al	12/4/2017		Brown & Crouppen, P.C.

Yellow highlighting indicates that the case was previously listed on one or two status conference agendas per PTO 14 (D.E. 270).  
Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

# Exhibit E



**LEVIN • PAPANTONIO  
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November 1, 2017

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**VIA FEDEX**

Benjamin W. Hulse  
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431 South Seventh Street  
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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Laura Gruetzmacher v. 3M Company*, Case No. 0:17-cv-00998-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Laura Gruetzmacher v. 3M Company*, Case No. 0:17-cv-00998-JNE-FLN

---

**Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.**



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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Maria Guzman v. 3M Company*, Case No. 0:17-cv-01017-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see attached documentation to cure deficiencies for the above captioned case.

Sincerely,

*Dan A. Nigh*  
Daniel A. Nigh

DAN/ec  
Enclosure

Response to Deficiencies

*Maria Guzman v. 3M Company*, Case No. 0:17-cv-01017-JNE-FLN

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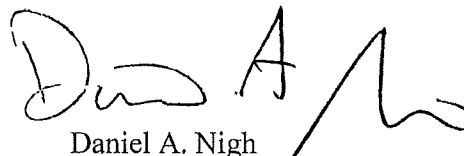
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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Raymond Husman v. 3M Company*, Case No.: 0:17-cv-01139-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see the attached documentation to cure deficiencies for the above captioned matter.

Sincerely,

  
Daniel A. Nigh

DAN/aw

Enclosure

Response to Deficiencies

*Raymond Husman v. 3M Company*, Case No.: 0:17-cv-01139-JNE-FLN

---

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November 30, 2017

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**VIA FEDEX**

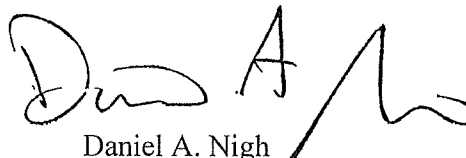
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*Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Michael Pickens v. 3M Company*, Case No.: 0:17-cv-01215-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see the attached documentation to cure deficiencies for the above captioned matter.

Sincerely,

  
Daniel A. Nigh

DAN/aw

Enclosure

Response to Deficiencies

*Michael Pickens v. 3M Company*, Case No.: 0:17-cv-01215-JNE-FLN

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**VIA FEDEX**

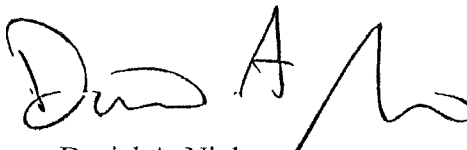
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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Mildred Sparks v. 3M Company*, Case No.: 0:17-cv-01250-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see the attached documentation to cure deficiencies for the above captioned matter.

Sincerely,



Daniel A. Nigh

DAN/aw

Enclosure

Response to Deficiencies

*Mildred Sparks v. 3M Company*, Case No.: 0:17-cv-01250-JNE-FLN

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Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*  
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case  
*Christopher Peters v. 3M Company*, Case No.: 0:17-cv-01323-JNE-FLN

Dear Counsel:

Pursuant to paragraph 6 of PTO 14, please see the attached documentation to cure deficiencies for the above captioned matter.

Sincerely,

Daniel A. Nigh

DAN/aw

Enclosure

Response to Deficiencies

*Christopher Peters v. 3M Company*, Case No.: 0:17-cv-01323-JNE-FLN

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**Deficiencies cannot be cured at this time as we have not been able to contact client but will continue to make a diligent effort to do so.**